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Attorneys for Defendants
 Guccione Collection, LLC, Jeremy Frommer,
 Rick Schwartz, Jerrick Media Holdings, Inc.,
 Jerrick Ventures, Inc., and Jerrick Ventures
 LLC,

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PENTHOUSE GLOBAL MEDIA,
 INC., a Delaware corporation,
 GENERAL MEDIA
 COMMUNICATIONS, INC., a New
 York corporation,
 Plaintiffs,

v.

GUCCIONE COLLECTION, LLC, a
 Delaware limited liability company,
 JEREMY FROMMER, an individual,
 RICK SCHWARTZ, an individual,
 JERRICK MEDIA HOLDINGS, INC.,
 a Nevada corporation, JERRICK
 VENTURES, INC., a Nevada
 corporation, JERRICK VENTURES
 LLC, and DOES 1-10, inclusive,
 Defendants.

Case No.: 2:17-CV-04980-PA (FFMx)
 Hon. Percy Anderson, Courtroom:
 9A

**DEFENDANTS' REQUEST FOR
 A STAY OF PROCEEDINGS**

Complaint Filed: July 6, 2017
 1st Am. Cmplt. Filed: Aug. 30, 2017
 2nd Am. Cmplt. Filed: Dec. 11, 2017

Current Trial Date: October 2, 2018

1 Defendants Guccione Collection, LLC, Jeremy Frommer, Rick Schwartz,
 2 Jerrick Media Holdings, Inc., Jerrick Ventures, Inc., Jerrick Ventures LLC
 3 (collectively, “Defendants”), by and through their undersigned counsel, hereby
 4 respectfully request that the Court stay this action for 90 days in light of Plaintiffs’
 5 recent bankruptcy petition; and, in the event the Court denies Defendants’ request,
 6 adjust the scheduling order due to scheduling conflicts with religious holidays.

7 Defendants request that this matter be stayed for 90 days due to the Chapter 11
 8 proceeding commenced by the plaintiffs (among other debtors) on January 11, 2018
 9 in the United States Bankruptcy Court, Central District of California (San Fernando
 10 Valley Division) (Case No. 1:18-bk-10098-MB) (the “Bankruptcy Case”).

11 The assets whose ownership and rights are at issue in this proceeding are
 12 undoubtedly part of the estate of the Chapter 11 debtors (including the plaintiffs) in
 13 the Bankruptcy Case. There is no method by which the rights of the parties in this
 14 action can be determined and adjudicated without involving the Bankruptcy Court.
 15 As the Bankruptcy Case is in its infancy, it would be a waste of judicial (and the
 16 parties’) resources to proceed with this action at this juncture.

17 Defendants communicated their desire and intent to seek a stay of this
 18 proceeding to Plaintiffs’ counsel of record (Caroline Mankey) in this action.¹ Upon
 19 information and belief, Ms. Mankey is not currently authorized to take any action on
 20 behalf of the Plaintiffs in this case as she must first obtain approval from the
 21 Bankruptcy Court to act of Plaintiff’s behalf. She has yet to obtain such approval.
 22 (Based on a review of the docket in the Bankruptcy Case, upon information and belief,
 23 no such request has been made and there is no current timetable for this matter to be
 24 addressed.)

27 ¹ Plaintiffs’ counsel’s current firm, and prior firm, are on the list of creditors of the Chapter 11
 28 debtors in the Bankruptcy Case.

Debtors' counsel in the Bankruptcy Case (Michael Weiss) advised Defendants' counsel that it was his understanding that this action was stayed as a result of the Bankruptcy Case and that he currently did not have time to deal with the assets at issue in this action as a result of other pressing matters in the Bankruptcy Case.

Based on the foregoing, Defendants respectfully request that this action be stayed for a minimum of 90 days and that a conference be scheduled with the parties at the conclusion of the stay to determine future proceedings.

Should the Court deny Defendants' request for a stay, Defendants respectfully request that the Court modify certain dates in the January 19, 2018 Scheduling Order (Docket No. 54) due to counsel's religious observance. The scheduled date for a hearing on pre-trial motions is September 24, 2018 and the trial has been scheduled for October 2, 2018, which are Jewish holidays that counsel observes and will therefore be unavailable to participate on those dates. Therefore, counsel respectfully requests that the pre-trial motions hearing date be moved to the week of October 8 and the trial moved to the week of October 15.

DATED: January 24, 2018

Respectfully submitted,

SYVERSON, LESOWITZ & GEBELIN LLP

Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), I hereby attest that the attorneys on whose behalf this filing is jointly submitted, have concurred in this filing.

By: /s/Steven T. Gebelin

STEVEN T. GEBELIN
ERIK S. SYVERSON

**COHEN TAUBER SPIEVACK &
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